

FILED

AUG 24 2022

CLERK, U.S. DISTRICT COURT
NO. 4:22-CR-~~210~~-BP Deputy

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

OMAR KHAN

FACTUAL RESUME**PLEA TO COUNT ONE OF THE INFORMATION WITH WAIVER OF APPEAL:**

Count One: Theft of Government Money (in violation of 18 U.S.C. § 641)
(misdemeanor)

MAXIMUM PENALTY:

\$100,000 fine and not more than one (1) year imprisonment, plus a term of supervised release of not more than 1 year. If the defendant violates any condition of supervised release, the Court may revoke such term of supervised release and require the defendant to serve an additional period of confinement. Further the Court must impose a Mandatory Special Assessment of \$25.00.

ELEMENTS OF THE OFFENSE:

The essential elements which must be proved beyond a reasonable doubt in order to establish the offense charged in Count One of the Information, are as follows:

- First.** That the money described in the Information belonged to the United States government and had a value of less than \$1,000 at the time alleged;
- Second.** That the defendant embezzled, stole and knowingly converted such money to the defendant's own use and the use of another; and
- Third.** That the defendant did so knowing the money was not his and with intent to deprive the owner of the use and benefit of the money.

STIPULATED FACTS:

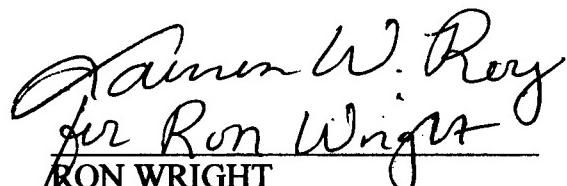
In or about 2020 and 2021, in the Fort Worth Division of the Northern District of Texas, defendant, Omar Khan applied for and received unemployment insurance benefits, even though he had a full-time job with the Fort Worth Fire Department. Khan personally certified that he was not working at the time he sought such benefits. The unemployment insurance funds were the property of the United States and Khan stole and knowingly converted these funds for his own use. Khan knew that he was not entitled to these funds.

As a specific example, Khan obtained approximately \$938.00 in unemployment insurance compensation on or about October 30, 2020.

The defendant agrees that the defendant committed all the essential elements of the offense. This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support the defendant's guilty plea to Count One of the Information.

AGREED TO AND STIPULATED on this 3rd day of July, 2022.


OMAR KHAN
Defendant


Jaimon W. Rery
for Ron Wright
RON WRIGHT
Attorney for Defendant